

IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF WEST VIRGINIA

J. RON WRIGHT,  
IN HIS CAPACITY AS ADMINISTRATOR  
of the Estate of TERRY LEE RICHARD, JR.,

Plaintiff,

v.

CIVIL ACTION NO. 1:15-CV-205

SBA COMMUNICATIONS CORP.,  
SBA TOWERS, LLC, SBA  
INFRASTRUCTURE, LLC,  
SBA NETWORK SERVICES, LLC,  
FDH VELOCITEL, FDH ENGINEERING, INC.,  
FDH INNOVATION and FDH, INC.,

(consolidated for discovery purposes with  
Civil Action Nos. 1:15-CV-204, 1:15-CV-206,  
1:15-CV-207, 1:16-CV-228, and 1:16-CV-24)

Defendants,

and

FDH, INC., now known as KCHM, INC., and  
FDH ENGINEERING, INC., now known as  
KCHM and ASSOCIATES, INC.,

Third-Party Plaintiffs,

v.

S&S COMMUNICATION SPECIALISTS, INC.,  
THE ESTATE OF KYLE KIRKPATRICK,  
JERRY HILL and RANDALL McELHANEY,

Third-Party Defendants.

and

VELOCITEL, INC. d/b/a FDH VELOCITEL,

Third-Party Plaintiff,

v.

THE ESTATE OF KYLE KIRKPATRICK,  
JERRY HILL and RANDALL McELHANEY,

Third-Party Defendants.

**NOTICE OF COMPLIANCE WITH COURT'S DIRECTIVE**

The Defendants, KCHM, Inc. f/k/a FDH, Inc. and KCHM and Associates, Inc. f/k/a FDH Engineering, Inc. ("FDH Entities"), hereby give notice to all parties that they have complied with the Court's verbal directive during the August 22, 2018 hearing. Pursuant to said directive, the

FDH Entities have submitted the subject Escrow Agreement as directed by the Court (unredacted version submitted to the Court for *in camera* review, and redacted version submitted to counsel for the Plaintiffs).

Respectfully submitted the 23rd day of August, 2018.

**Defendants, KCHM, INC. f/k/a FDH, INC.  
and KCHM AND ASSOCIATES, INC. f/k/a  
FDH ENGINEERING, INC.,  
By Counsel:**

/s/ Stanley A. Heflin, III

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Of Counsel

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and

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Third-Party Plaintiff,

v.

THE ESTATE OF KYLE KIRKPATRICK,  
JERRY HILL and RANDALL McELHANEY,

Third-Party Defendants.

**CERTIFICATE OF SERVICE**

This is to certify that on the 23rd day of August, 2018, the undersigned counsel served the foregoing “*NOTICE OF COMPLIANCE WITH COURT’S DIRECTIVE*” upon counsel of record via one or more of the following methods: (1) electronic notification through the Court’s

CM/ECF system; and/or (2) facsimile, and/or (3) depositing true copies in the United States Mail, postage prepaid, in envelopes addressed as follows:

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Richard, Jr., and Jerry Hill***

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Richard, Jr., Jerry Hill***

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(Civil Action No. 1:16-CV-24, only)***

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(in Civil Action Nos. 1:15-CV-204, 1:15-CV-  
205, 1:15-CV-206, 1:15-CV-207 and 1:16-  
CV-24, only)***

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SBA Towers, Inc., and SBA Infrastructure,  
LLC, and Plaintiffs, SBA  
Telecommunications, LLC, as successor in  
interest to SBA Telecommunications, Inc.  
and SBA Towers, LLC***

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(in Civil Action Nos. 1:15-CV-228  
and 1:16-CV-24, only)***

S&S Communication Specialists, Inc.  
418 West Main  
Hulbert, OK 74401  
***Third-Party Defendant  
(no longer represented by counsel in  
Civil Action Nos. 1:15-CV-204, 1:15-CV-205,  
1:15-CV-206 and 1:15-CV-207)***

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and, Jerry Hill***

/s/ Stanley A. Heflin, III